

Serial No. 09/753,855  
Art Unit No. 2175

REMARKS

Claims 1-39 are currently pending in the patent application. The Examiner has objected to the figures due to the lack of a Fig. 6 and due to the discrepancy between reference numeral 224 of Fig. 2 and the corresponding text. The Applicants have amended the relevant paragraphs of the Specification to address the Examiner's concerns.

Claims 1-14, 31-35, 37 and 39 are rejected under 35 USC 102 as anticipated by Hanzek. The Examiner has indicated that Claims 15-30 and 36 are allowed, and that Claim 38 is objected to but would be allowed if rewritten to depend from an allowable base claim. With regard to Claim 38, Applicants note that the claim depends from Claim 21, which has been allowed by the Examiner. Accordingly, Applicants request reconsideration of the objection to Claim 38.

All of the claims rejections are based on the Hanzek patent. Applicants conceived of the subject invention and reduced it to practice prior to the earliest effective date of the Hanzek patent. Applicants are prepared to submit a Declaration of Prior Invention to remove the Hanzek patent as a reference; however, Applicants are not submitting a Declaration at this time, since Applicants believe that the

YOR920000155

-15-

Serial No. 09/753,855  
Art Unit No. 2175

claims are not anticipated by the teachings of the Hanzek patent.

The Hanzek patent is directed to an on-line consumer products communications system for allowing a consumer to track order status. Hanzek teaches that identifier information is generated and tracked for the user/consumer and the order. The Examiner has focused on Fig. 9 of the Hanzek patent which shows input messages being intercepted by a listener component 902 and sent to parser 904. At parser 904, specific fields are extracted from the message and sent to dispatcher 906, which sends those fields (a.k.a., search parameters) to searcher 908. The searcher 908 locates the customer order information from the storage location 612 and sends it back for delivery to the user/consumer (Col. 14, line 34 through Col. 15, line 20).

Applicants respectfully assert that the Hanzek patent does not teach or suggest the invention as claimed. With regard to Claims 1-2, the Hanzek patent provides no teaching of identifying a document type, as is expressly claimed. Hanzek merely shows that a parser exists and that pre-specified fields of a received request are extracted from a request by the parser and are sent to the dispatcher. Hanzek does not teach or suggest identifying a document

YOR920000155

-16-

Serial No. 09/753,855  
Art Unit No. 2175

type. Further, the Hanzek patent does not provide any teachings which anticipate or obviate the claimed step of finding an extension component to process a structured document. Hanzek only shows one listener, one parser, one dispatcher, and one searcher. Hanzek neither teaches nor suggests that multiple extension components are available to process different documents nor does it teach or suggest invoking a selected extension component to generate a usable in-memory data structure. Hanzek does not generate a data structure, it merely extracts pre-specified fields from a request.

Applicants further assert that the Hanzek patent does not teach or suggest the invention as set forth in Claims 3-6. With reference to the language of the independent claim, Claim 3, Hanzek does not teach a method for generating heterogeneous data structures. Hanzek merely provides a method for locating customer order status information in response to a customer request. Hanzek does not teach or suggest having a first program and a second program, wherein the first program has a set of structured data in a first data structure usable only by said first program. Further, Hanzek neither teaches nor suggests sending a first document including data from a first data

YOR920000155

-17-

Serial No. 09/753,855  
Art Unit No. 2175

structure to a second program and employing dynamic parsing to parse said data from the first data structure into a second data structure for use by the second program. The Hanzek patent teaching of extracting pre-specified fields from a request to forward to a dispatcher and searcher does not anticipate the claimed dynamic parsing of information.

With regard to Claims 7-10, Hanzek does not teach that a third data structure be created by changes to either a first or a second data structure and that, in response to the changes, a fourth data structure is automatically created. As stated above, Hanzek simply extracts pre-specified data and sends it to the next component in the pipeline. Hanzek does not make any mention of a data structure, let alone of automatically generating an updated data structure in response to changes to another data structure.

With regard to the language of Claims 11-14, Applicants respectfully contend that the Hanzek patent does not teach an association module or any associating step as claimed. Moreover, Hanzek does not suggest associating each data object with a unique ID and with a location in a virtual table data structure. Rather, Hanzek teaches that customer identifiers be assigned and that order identifiers be

YOR920000155

-18-

Serial No. 09/753,855

Art Unit No. 2175

assigned, but those are not unique identifiers associated with data objects. Hanzek does not, in response to requests to provide information about a property of a data object identified by the unique ID, provide a query handler extension for each request, does not produce a value representing its location in a virtual table data structure, and does not send the location to the client for the client to access the object in the virtual table. Rather, Hanzek sends the extracted fields to the searcher, locates the information, and sends a search result. Hanzek provides no teachings of how the data is stored or accessed. Clearly, therefore, it cannot be maintained that Hanzek anticipates the claimed means and steps for using the virtual table.

With regard to Claims 31-35 and 39, Applicants have reviewed the cited figures, Figs. 8, 10 and 11 and the cited passage from Col. 2. Applicants respectfully assert that none of the cited Hanzek teachings mention replicas, let alone the method steps for creating replicas. Similarly, with regard to Claim 37, Applicants can find nothing in the Hanzek patent which teaches or suggests the parsing and linking set forth in Claim 37, let alone the providing of a client application which employs those processes.

YOR920000155

-19-

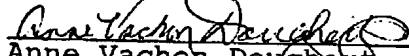
Serial No. 09/753,855  
Art Unit No. 2175

It is well established under U. S. Patent Law that, for a reference to anticipate claim language under 35 USC 102, that reference must teach each and every claim feature. Since the Hanzek patent does not teach any of the steps or means set forth in the above-enumerated claim features, it cannot be maintained that Hanzek anticipates the invention as set forth in the independent claims, Claims 1, 3, 7, 9, 11, 13, 31, 37, and 39, or the claims which depend therefrom and add further limitations thereto.

Based on the foregoing amendments and remarks, Applicants respectfully request entry of the amendments, reconsideration of the amended claim language in light of the remarks, withdrawal of the rejections, and allowance of the claims.

Respectfully submitted,

M. C. Chu-Carroll, et al

By:   
Anne Vachon Dougherty  
Registration No. 30,374  
Tel. (914) 962-5910

YOR920000155

-20-